Remarks

Applicants respectfully request reconsideration of the present U.S. Patent application as amended herein. No claims have been amended. No new claims have been added. Thus, claims 1-16 are pending.

35 USC §102

Claims 1-16 stand rejected under §102(b) as being anticipated by Monroe (US Pat. No. 5,798,458) and alternatively as being anticipated by Honda (US Pat. No. 5,296,884), and alternatively as being anticipated by Schipper (US Pat. No. 5,987,136). Applicant respectfully traverses the rejections for at least the following reasons.

The Examiner's attention is directed to the title of the invention, which is "Recording-Location Determination," hence at least one goal in recited embodiments is determining a location at which recording has occurred, and more specifically, doing so while traveling. The title is noted because Monroe does not teach this. While Monroe uses many of the same terms, e.g., recording, location, travel, etc., they are used with a very different meaning in a very different. Monroe teaches about identifying where in an airplane a catastrophic event, e.g., a gunshot, bomb, etc., occurred using systematically placed acoustic monitors to determine a location of the catastrophic event. See, e.g., Monroe at Abstract, col. 2 lines 14-21, col. 2 lines 57-58, etc. Thus, it should be obvious Monroe is ***not*** determining a location at which a recording is occurring, instead Monroe is making a recording and determining a position within the recording space where a catastrophic event occurred. This is very different from what is claimed.

For example, claim 1 recites:

> A method for annotating a recording with a current location comprising:
>
> monitoring, while traveling, for ***different types of signal sources*** that may be used to facilitate determining a current location;
>
> identifying a first signal source at a first time;
>
> determining a current location based at least in part on the first signal source;
>
> making a recording; and
>
> associating the current location with the recording.

(Claim 11 has corresponding language.) It is respectfully submitted the Monroe document fails to anticipate, teach or suggest the monitoring, while traveling, ***for different types of signal sources***. A review of Monroe shows Monroe appears only to teach about a ***single signal source***, namely acoustic recordings made at strategic locations within an airplane. The portion of Monroe at col. 9 line 66 through col. 10 line 21 does not alter this understanding of Monroe, instead it simply makes more clear how the ***same type*** of acoustic recording are multiplexed and analyzed to determine "the location of the source of the sound" (col. 10 line 16).

This Monroe single-source analysis ***cannot*** anticipate the recited monitoring for ***different*** types of signal sources. For more detail regarding different signal sources and location determination, see the Specification, for example, at paragraph 0018 and 0021. It should be appreciated that such monitoring for different signal sources is not what is taught or even remotely suggested by Monroe. Thus it is submitted the rejection of claims 1 and 11 are overcome and Applicant respectfully demands their withdrawal.

Similarly, the Honda reference also cannot anticipate claim 1 or 11. While Honda notes that a variety of location determination signals, such as Global Positioning System (GPS), loran, etc. may be used to find one's current location when taking a picture, Honda only teaches using ***one*** of these to perform the picture annotation. Honda does ***not*** speak to the recited monitoring for multiple ones of these signals while traveling, and selecting a first signal source for facilitating determining a current location. See, e.g., col. 4 line 44 which gives a single signal example using Navstar. A cursory review of Honda does not give Applicant a different understanding of its teachings.

Similarly, the Schipper reference also cannot anticipate claims 1 or 11. While Schipper notes a variety of PDS (position determining system) signals (col. 8 line 11; col. 10 line 1) such as Global Positioning System (GPS), Global Orbiting Navigational Satellite System (GLONASS), etc. may be used to find one's current location (col. 10 lines 23-30), as with Honda, Schipper only teaches using ***one*** of these to perform the picture annotation. Schipper does ***not*** speak to the recited monitoring for multiple ones (different typed) of these signals while traveling, and selecting a first signal source for facilitating determining a current location. See, e.g., col. 10 lines 30-63 which gives a single signal example using a PDS signal atenna "rigidly attached to the digital camera 13" (col. 10 lines 2-3). A cursory review of Schipper does not give Applicant a different understanding of its teachings.

Regarding dependent claims 2-10 and 12-16, while deemed allowable for at least the reason as depending from allowable base claims, it is respectfully submitted the Office has failed to provide a rejection and hence it is presumed the Office intends to

allow these claims as filed. **A notice of allowance for these claims is requested**, or a rejection indicating (as required to support a §102 rejection) where every element of the dependent claims is present in the documents relied on by the Office.

In particular, Applicant traverses the rejections of claims 2-10 and 12-16 since the Office does not show where in the Monroe, Honda or Schipper documents these documents anticipate the recited elements. More specifically, for example, regarding claim 2, there is no teaching in the documents relied on by the Office of post-travel opoerations as recited. Regarding claim 4 in particular, there is no teaching in the documents relied on by the Office of the recited "signal source type." Regarding claim 5, there is no teaching in the documents relied on by the Office of the recited "margin of error." Regarding claim 6, there is no teaching in the documents relied on by the Office of the variety of signal types including, for example, 802.11 hotspots and RDS transmitters. Regarding claim 7, since the documents relied on by the Office only speak to using a single type of location determination signal, these documents cannot anticipate the recited second signal source ***different from*** the first signal source nor can they anticipate claim 8's determination of a primary position determination device being unavailable. And, regarding claim 10, there is no discussion in these documents, as best they are understood, of a coverage map.

Similar limitations discussed above are present in dependent claims 12-16.

Conclusion

For at least the foregoing reasons, Applicants submit that the rejections have been overcome. Therefore, claims 1-16 are in condition for allowance and such action is earnestly solicited. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the present application. Please charge any shortages and credit any overcharges to our Deposit Account number 02-2666.

Respectfully submitted,

Date: May 16, 2006

/ Steven D. Yates # 42,242 /
Steven D. Yates
Patent Attorney
Intel Corporation
(503) 264-6589

c/o Blakely, Sokoloff, Taylor & Zafman, LLP
12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1026